

Atty. Dkt. No. 039153-0306 (F0793)

**REMARKS**

Applicant respectfully requests reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow.

Claims 7, 10, 12, 21 and 27 are currently being amended. This amendment adds, changes and/or deletes claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, is presented, with an appropriate defined status identifier.

After amending the claims as set forth above, claims 7-14 and 21-32 remain pending in this application.

In Paragraphs 1 and 2 of the Office Action, claims 7-14, and 21-31 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,097,361 ("Rohner"). The Examiner states:

Rohner . . . discloses a method of manufacturing an integrated circuit comprising providing a patten of radiation via an LCD assembly . . . Rohner . . . discloses that the LCD panel receives the display signals and displays the desired pattern in response to the display signals, wherein the control unit is adapted for coupling the external computer system . . . wherein the control unit is adapted to a computer system in order to display data from the computer system . . . and configured to store the data (database) within the memory unit in order to forward the display data (from a workstation executing a software program) via the display driver that produces multiple display signals to the LCD panel. . . .

Applicant respectfully traverses the rejection.

In Paragraphs 3 and 4 of the Office Action, claim 32 is rejected under 35 U.S.C. § 103 over Rohner in view of EP 0315589 ("Ciba-Geigy"). The Examiner states:

The difference between the claim in Rohner is that Rohner does not disclose the control signal as a video signal. . . . It would have

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been obvious to use video output devices as the control signal as taught by Ciba-Geigy because Rohner does not limit the display signal . . .

Applicant respectfully traverses the rejection. Ciba-Geigy and Rohner is referred to as the cited art below.

In Paragraph 5 of the Office Action, the Examiner responds to Applicant's arguments. The Examiner states:

Applicant argues that Rohner is silent as to how the control signal is generated. Rohner, in col. 7, lines 17-34, discloses that a display driver receives the display data from the memory unit and produces multiple display signals (control signal) required to display the desired pattern (image pattern) upon the LCD pattern.

Applicant respectfully traverses the Examiner's response to Applicant's answer.

Applicant respectfully traverses the rejection with respect to amended independent claims 7, 21 and 27. To advance prosecution, Applicant has amended independent claims 7, 21 and 27 to more particularly recite the generation of the display signal from individual images associated with individual parts. According to the claimed process, the circuit component is first chosen by the computer and then the image for that circuit component is pulled from a database. The computer then chooses other circuit components and pulls those images from the database. The images associated with the chosen components are then used to generate the control signal that configures the mask. This process is different than a process that simply receives a completed pattern and generates the control signal from the completed pattern.

An exemplary embodiment of the generation of the control signal is described in the present application. The present application states:

System 10 can provide ASIC-type functionality by selecting parts from database 34, media storage unit 38, or database 42 in accordance with a program to provide images on wafer 12. For example, a software program selecting transistor, diodes and their

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interconnections can be executing by computer 32 to cause mask 20 to provide the appropriate structures on wafer 12.

The individual images for the individual parts can be stored in database 34, media storage unit 38 or database 42. In this way, computer 32 only operates a minimal software program describing the integrated circuit. Images for individual components are retrieved from unit 32 or database 42 when needed.

See present application, p. 7, line 26 – p. 8, line 7 (emphasis added). In addition, the present application describes another advantage of the claim method as follows:

Database 34, media storage unit 38 and database 42 can be updated periodically to provide structures for particular processes, technologies, new structures, etc. In this way, updates do not require reformation of fixed mask or revision of the program executed by computer 12 to generate the image on mask 20.

See present application, page 8, lines 17-21. Therefore, the process recited in claims 7-14 and 21-31 provides significant advantages over the cited art.

Such an advantageous process is not shown, described, or suggested in Rohner or Ciba-Geigy. Rohner does not disclose or suggest a method of using a database of images and selecting components associated with the images in the database to generate the control signal. As discussed in the previous action, Rohner is silent as to how the representation of the pattern is generated. Indeed, the use of individual component images, ASIC functionality, software efficiencies, and updates of databases for new technologies and new structures is not contemplated by Rohner.

Despite the Examiner's assertion that Rohner discloses the claimed generation of the control signal in col. 7 at lines 17-34, Rohner does not provide the advantageous method recited in independent claims 7, 21, and 27. Indeed, Rohner merely describes the conventional moving of display data from memory to the display driver. Rohner does not show, describe, or suggest the selection of individual components and the retrieval of individual images associated with those individual components. Again, Rohner merely describes the entire pattern image being

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stored in unit 38 and being transferred to display driver 34 in a conventional fashion. Ciba-Geigy fails from the same deficiency as Rohner. Accordingly, it is respectfully submitted that independent claim 7 and its dependent claims 8-14, independent claim 21 and its dependent claims 22-26 and independent claim 27 and its dependent claims 28-32 are patentable over the cited art.

Applicant believes that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 06-1447. Should no proper payment be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 06-1447. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 06-1447.

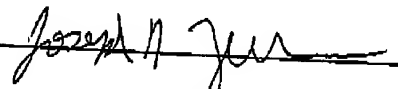
Respectfully submitted,

Date

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